

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

<b>Plaintiffs' Executive Committee for Personal Injury and Death Claims</b>	<b>Plaintiffs' Executive Committee for Commercial Claims</b>
Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

May 14, 2021

The Honorable Sarah Netburn  
United States Magistrate Judge  
Thurgood Marshall Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn,

Pursuant to your April 30, 2021 order (ECF no. 6789), the PECs have conferred with DOJ on redactions of FBI material in the attached pleadings concerning Plaintiff's motion to compel the FBI to disclose the [REDACTED] interview summaries of Modhar Abdullah. The FBI served their proposed redactions on the PECs and they are attached hereto in yellow highlights concerning those redactions.

We believe the FBI has over redacted in a few places, but it makes little sense to quibble on those for the purposes of today's filing.

The PECs accordingly filed the proposed redactions with that text blacked out from public view today, but note that the PECs once again object to the continued overuse of the protective orders that apply to the FBI and KSA material produced in discovery and that we strongly believe pursuant to the normal practice in federal court, that all documents filed in court need to be done in full public view with full transparency. It is highly unusual and unfair that we cannot show and discuss these materials with our own clients.

The PECs reserve our right to challenge the protective order in its entirety.

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Respectfully submitted,

KREINDLER & KREINDLER

/s/ Andrew J Maloney, III, Esquire

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PEC Co-Liaison Counsel

MDL 1570 Plaintiffs' Exec. Committee  
for Personal Injury and Death Claims

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/s/ Robert T. Haefele, Esquire

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MDL 1570 Plaintiffs' Exec. Committee  
for Personal Injury and Death Claims

COZEN O'CONNOR

/s/ Sean P. Carter, Esquire

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MDL 1570 Plaintiffs' Exec. Committee  
for Commercial Claims

cc: